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August 12, 2022

Smith et al. v. Annucci et al.

1:21-cv-01715-RA [rel. 1:17-cv-07954-RA-OTW]

Dear Judge Wang:

As previewed in the parties' July 29, 2022 joint status letter (ECF No. 150), the parties respectfully request an extension of several of the deadlines in the Joint Case Management Plan (ECF No. 137). The parties have been working together to resolve several discovery disputes and Defendants have not yet completed their production of documents to Plaintiffs' first set of document requests. Therefore, the parties request an extension of the following deadlines:

Event	Current Deadline	Proposed Deadline
Final production of documents responsive to Plaintiffs' first set of document requests	May 1, 2022	October 1, 2022
Service of initial set of interrogatories	September 1, 2022	October 15, 2022
Service of final requests for admission	September 1, 2022	February 1, 2023
Complete depositions of fact witnesses	September 15, 2022	February 15, 2023
Complete fact discovery	October 1, 2022	March 1, 2023
Complete expert discovery	February 1, 2023	July 1, 2023

Respectfully,

/s/ David M. Stuart

David M. Stuart
Attorney for Plaintiffs

/s/ Andrew Blancato

Andrew Blancato
Attorney for Defendants

The Honorable Ona T. Wang
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
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New York, NY 10007

VIA CM/ECF